

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**YIEN-KOO KING,**

**Plaintiff,**

**-against-**

**ANDREW WANG, SHOU-KUNG WANG, BAO WU  
TANG, JIAN BAO GALLERY, ANTHONY CHOU,  
CHEN-MEI LIN, WEI ZHENG, YE YONG-QING, YUE  
DA-JIN and JOHN DOES 1-9,**

**Defendants.**

**1:14-Civ-07694-(LJL) (JLC)**

**DECLARATION OF PATRICK REGAN**

**PATRICK REGAN** declares pursuant to 28 U.S.C. 1746, under the penalties of perjury, as follows:

1. I was retained by counsel for Plaintiff Yien-Koo King ("YK") to provide opinions related to Chinese art and to provide appraisals of classical Chinese paintings that were at some point in the possession of the estate of Chi-Chuan Wang (the "Estate"). Specifically, I was asked to provide a fair market appraisal, as of October 10, 2019, of a group of 98 classical Chinese paintings sold by the Estate (the "98 Paintings"). I also was asked to provide a retail appraisal, as of August 2009, of 14 of those 98 Paintings, which appear to have been sold by the Estate on August 17, 2009.

2. I submit this declaration to place before the court a true and correct copies of certain documents, the contents of which I incorporate herein and expect to testify to at a future trial in this action.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Report of Patrick Regan, submitted on October 11, 2019, exclusive of its two appraisal appendices (the "Regan Report."). I represent that the Regan Report contains true and accurate statements of my opinions and analysis in this matter.

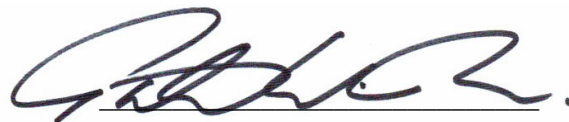
4. Attached hereto as Exhibit 2 is a true and correct copy of "Appendix B" to the Regan Report. "Appendix B" to the Regan Report is a retroactive retail value appraisal (the "RV Appraisal") of fourteen (14) paintings which I understand to have been sold by the Estate in August 2009 pursuant to a contract with an individual named Yue Da Jin (the "Yue Da Jin Paintings").

5. The RV Appraisal was prepared by me in compliance with the rules of USPAP 2018-2019 (Uniform Standard of Professional Appraisal Practice) and follows the guidelines of USPAP for providing all of the necessary information/analysis to satisfy the report writing requirements of an unrestricted appraisal.

6. As stated in the Regan Report and RV Appraisal, it is my professional opinion that the retail value of the Yue Da-Jin Paintings as of August 2009 was \$1,978,000.00.

7. Attached hereto as Exhibit 3 is a true and correct compendium of comparable art sales which I reviewed and considered in forming my opinions as to the values of the paintings identified in RV Appraisal.

Dated: Milford, Connecticut  
February 13, 2020

A handwritten signature in black ink, appearing to read 'Patrick Regan', with a horizontal line underneath it.

Patrick Regan